

# EXHIBIT 2

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To: John Chen  
From: Richard J Curiale  
CC: Nita White-Ivy, Tom Eacobacci, Neelam Sandhu  
Date: March 17, 2021

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March 17, 2021

*Re: Investigation Report Involving Various Issues Causing "Friction" Between the Sales Team and the Elite 30 Team*

Dear John:

I have completed my investigation into the issues that are causing "friction" between the sales teams headed by [REDACTED] and the Elite 30 team headed by Neelam Sandhu. As part of my investigation, I interviewed a wide cross section of people including:

[REDACTED]

### Short Conclusion

There is more than just "friction" between the sales teams headed by [REDACTED] and the Elite 30 team headed by Neelam Sandhu (hereinafter referred to as "the two teams"). The atmosphere which hangs over these two teams is nothing short of toxic. Their relationship is completely dysfunctional and is negatively impacting their ability to maximize their success in the individual roles they are tasked with at BlackBerry. There are no plans by the sales teams designed to maximize revenue from the "Elite 30 clients" by utilizing the contacts and leverage that Neelam has to offer.

When questioned about the "chasm" that exists between the [REDACTED] and Sandhu teams, each team points a finger at the other team and recounts numerous instances when they were misled, demeaned, insulted, disparaged or otherwise "treated with little or no respect". Each team, of course, cites examples to support their respective positions. However, after interviewing a dozen salespeople, managers and executives, I have concluded that the consistent and overwhelming evidence places the blame for this toxic and dysfunctional mess squarely at the feet of both [REDACTED]

### Discussion and Analysis of the Issues

[REDACTED] have a deep dislike for Neelam. As I was told, "the way the sales guys work, if someone in authority does not like [Neelam], that trickles down". [REDACTED] has been here for too short a period to have independently formed such negative feelings about Neelam. I believe [REDACTED] negative attitude towards Neelam has trickled down to [REDACTED]. I was told on more than one occasion that [REDACTED] [REDACTED] has made negative comments about Neelam. He has made insulting comments in phone calls. In one instance, on a phone call with the internal account team and the ISV partner, he stated that "Neelam is not relevant." He then stated that "if we lose this deal, we'll just blame it on Neelam." He has deleted Neelam's name from group emails before responding. Neelam has been told by colleagues that "[REDACTED] can't stand her" and has said as much to others. In another instance, John Chen had asked Neelam to connect with Accenture Federal. Before making the connection, Neelam looped in several people from BlackBerry, including [REDACTED]. Instead of contacting Neelam, [REDACTED] called [REDACTED] and began asking questions related to Accenture Federal. When [REDACTED] why he didn't just speak with Neelam directly, [REDACTED] said "I am asking you as I don't want to speak to the other person". The other person [REDACTED] was referring to was Neelam. Letting other people in the organization know that he does not want to speak with Neelam is another way of demeaning and diminishing Neelam's stature. One of Neelam's team members stated that "it's like people on the sales team were told not to work with us." This team member noted that [REDACTED] sees Neelam's team as "meddling and troublesome."

[REDACTED] tolerate Neelam only because of the support she has from the CEO. But even that "tolerance" is barely contained. [REDACTED] was open in his criticism of Neelam when I spoke with him. If he could cut her out of the picture, he would. His view is that he should own the accounts outright and be responsible for all aspects of their maintenance. He noted "I don't own my accounts end to end. I am never aware of what Neelam is doing. There is little communication between my team and Neelam's. She operates in a vacuum. We need to realign

her function with our team.” For someone who has only been here for a little over two months, it is troubling that [REDACTED] is so critical and dismissive of a system that was in place long before he got here. [REDACTED] is an unproven commodity. Rather than being critical of Neelam’s function - that has established proven success - he should focus his attention on establishing his own track record. [REDACTED] claims that the “friction “that exists between the two teams is due to Neelam’s lack of communication and coordination with the sales team. He states that this has resulted in a complete “fragmentation” of BlackBerry’s business. He claims that Neelam does not inform them of anything she is doing with a client and that this puts their ability to upsell and cross sell at risk. What [REDACTED] fails to realize is that he is the new kid on the block. He is the one who needs to do the reaching out. He is the one who needs to explore what services and support are available to him and his team to make them more productive. Neelam has proven herself. [REDACTED] has yet to prove anything. Yet, he acts and talks as if Neelam is subordinate to him and must bend her will to his and do his bidding. My feeling is [REDACTED] is digging a hole for himself he will not be able to climb out of.

[REDACTED] claim that Neelam is responsible for the rift between the two teams because she does not communicate and is not transparent about the calls she is having with the Elite 30. However, this is nothing more than an excuse for their lack of acceptance and use of the services Neelam provides. If [REDACTED] were sincere about trying to utilize Neelam in the way she could help them, they would reach out to her and get an agreement about how the respective teams could best complement each other in the future. Neelam would welcome this and create the same kind constructive and mutually beneficial relationship she has built with another SVP’s team. When I asked this SVP how he built such a collaborative relationship with Neelam, he said: “When Neelam and I first started working together, I was right up front with her. I told her we cannot have a situation where we appear uninformed. So, I told her ‘over communicate with us’. And she does. Our sales team gets invited to every sales meeting she sets up. She includes us in everything she is doing. We never get blindsided or caught off guard.” But this is not going to happen with [REDACTED] team because he simply does not like Neelam. And [REDACTED] models [REDACTED] behavior. As a result, both [REDACTED] are destined to fail. They cannot continue to be part of a company with a system that was designed to maximize Elite 30 sales if they have no respect for and continue to reject one of the most important pieces of that system – Neelam Sandhu.

Unfortunately, the perception throughout the organization is that [REDACTED] does not like Neelam Sandhu either. While no one could (or was willing) to identify any specific negative comments [REDACTED] has made about Neelam, the clear consensus was “I don’t know it for a fact, but I know it’s true.” And if this is true, this gives people like [REDACTED] [REDACTED] safe harbor regarding the lack of respect they have for Neelam. If they know [REDACTED] does not like Neelam and does not encourage his team to work with her to leverage the contacts she has made within the Elite 30, the [REDACTED] [REDACTED] at BlackBerry feel comfortable poking at her from what they perceive to be a safe distance while at the same time blaming her for “lack of communication” and “her failure to notify or coordinate” with them when she is engaging with Elite 30 clients they have responsibility for. While people like [REDACTED] [REDACTED] [REDACTED] can be directed to collaborate more with Neelam, until her value is recognized and communicated from high within [REDACTED] organization, any changes moving forward will be nothing more than cosmetic.

## How [REDACTED] Are Viewed Within the Organization

[REDACTED]

Overall, [REDACTED] is viewed by many people within the organization as a lightweight who is in over his head. Comments I continued to receive about [REDACTED] were very consistent." Various interviewees commented as follows: "not impressive" – "lacking in any urgency about anything" – "not creative from a deal perspective" – "his philosophy is see no evil, hear no evil" – "insecure" – "does not know how to build customer relationships" – "there would be no noticeable impact if [REDACTED] were gone". Most people believe that [REDACTED] survives at BlackBerry only because [REDACTED] brought him here and remains loyal to him. Most people feel that [REDACTED] ineffectiveness is hurting BlackBerry's bottom line. However, [REDACTED] is often his own worst enemy - even his supporters say he is difficult to get hold of, does not readily answer emails and frequently misses or cancels scheduled calls.

More troubling, however, is a phone call that Neelam talked to me about which occurred on November 30, 2020. On that day, Neelam called [REDACTED] to discuss a client matter. She said that suddenly [REDACTED] went on a tangent about all the attrition that was taking place at BlackBerry. According to Neelam, he said that a lot of salespeople were leaving BlackBerry and that in their exit interviews, they said the culture was really bad here. Neelam said he then stated, "the real problem is that there are too many Black people." Neelam said he repeated the statement, and she was speechless and remained silent. She said that [REDACTED] then started laughing and said "I guess I made a Freudian slip." When I asked [REDACTED] about this, he remembered the call and the comment. He admitted he said "there are too many Black people" but claimed he inadvertently left the "Berry" off the word "Black". He said he meant to say "BlackBerry people" and it came out "Black people." Thus, the comment "I guess I made a Freudian slip."

[REDACTED]

[REDACTED] is quickly developing a very negative reputation at BlackBerry. The animosity towards [REDACTED] stems from the recent deal with the Navy that Neelam was able to close in Q4. The wounds that emanated from the interactions among the teams in this matter are deep and will be difficult to heal.

Almost everyone I talked to (except for [REDACTED]) felt [REDACTED] was completely careless and negligent in how he handled the "side letter" allegation that he raised in that deal. A number of people felt he should be terminated for what he did and how he handled it. One interviewee stated that "this guy has no place at BlackBerry." Another stated: "What he did with the side letter was mind boggling. Why didn't he even try and get more information? Maybe he wanted to stick it to Neelam – get her terminated." Still, another said: "His side letter issue was bullshit. How dare someone here for so short a time make a serious allegation like that without any proof." Another person commented about [REDACTED] in general: "I don't trust him. He has made no effort to reach out [to Neelam's team]. And I am hearing other things. Things like he is not

responding to partners. The managing director from ISEC7 said they can't get a response from [REDACTED] – that they were being ignored – so they reached out to [REDACTED] and Neelam.”

The real animosity, however, emanated from Neelam's push to close the Navy deal in Q4. Neelam wanted the deal closed in Q4 as it would benefit BlackBerry to book the revenue before the end of Q4. There was universal agreement with that strategy among many of the executives I spoke with. One executive went so far as to say “anyone who wouldn't support doing everything possible to book that revenue in Q4 should be immediately terminated.” It was described as a “no brainer” that “could not possibly be controversial.” And yet, it was.

There was the belief among many people I spoke with that [REDACTED] intentionally tried to squash the Navy deal in Q4 and move it into Q1. While [REDACTED] claimed he did that because there was too much “risk” trying to get it booked in Q4, that claim was handily dismissed by almost everyone. The consensus was that [REDACTED] did everything he could to move the deal to Q1 so that he could have the revenue from the Navy deal applied to his Q1 quota. [REDACTED] called one salesperson and asked her to please back off from trying to get the deal done in Q4. He then told her there were “revenue recognition issues” she just did not understand. Needless to say, that call did not go well. Another very senior executive told me that if [REDACTED] pushed back against booking the deal in Q4 and wanted it booked in Q1, he should be terminated. Another interviewee said it made absolutely no sense that [REDACTED] was trying to push the deal to Q1. She said she called [REDACTED] and asked why anyone would do that. She said [REDACTED] laughed and said, “I'll take the 5<sup>th</sup> on that.” Not only is there overwhelming evidence that [REDACTED] tried very hard to stop the Navy deal from being booked in Q4, he willingly admitted that to me when I spoke to him. However, he claims that the reason he pushed back was only because he believed Neelam's efforts to close the deal in Q4 “put the entire deal at risk”. Apparently, outside of the sales organization, he is the only one who believed that.

Of course, when Neelam was successful and got Carasoft to commit to the deal so that it could be booked in Q4, [REDACTED] gave her no credit even though he benefited financially from her efforts. His only response was that BlackBerry needed make sure that Neelam's lack of communication and coordination on the Navy deal did not happen again.

One person I interviewed stated that [REDACTED] is already unhappy at BlackBerry. He stated that [REDACTED] is unhappy with what he views as his “limited role” with clients. One person commented that “I honestly think that when he interviewed [at BlackBerry] he was given the belief that he would control his clients top to bottom. He said he told the interviewer that in his previous job he owned everything and was able to get rapid growth. Then he comes here and finds that this is not how it works here.” I believe this is one of the primary reasons he does not want Neelam involved with what he believes should be his clients. He wants total control over all aspects of the client relationship.

### Conclusion

In light of all of the above, I have concluded that [REDACTED] [REDACTED] tried to stop the Navy deal from being booked in Q4. It was done for personal reasons. I do not credit [REDACTED]

claim that he wanted the deal done in Q1 because doing it in Q4 presented too much risk. [REDACTED] came here well after the start of Q4 and wanted the revenue generated by the Navy deal to count against his Q1 quota. By booking revenue from the Navy deal in Q4, [REDACTED] now has to find another deal to replace what he could have gotten from the Navy revenue in Q1. Why [REDACTED] wanted the revenue from the Navy deal booked in Q1, I do not know. He was well under his quota in Q4 and certainly could have used that revenue to bolster his Q4 numbers. [REDACTED] claims he wanted the deal done in Q1 because there was not a new product number available to put in the contract by the end of Q4. He said the Navy would not accept the contract without this information. Whether or not that is true, he gave no support to Neelam's efforts to close the deal in Q4 even though it was in BlackBerry's interest to do so.

I also concluded that [REDACTED] seriously mishandled the issue of the side letter and did not conduct even minimal due diligence before sending this accusation up the chain of command. Due to this kind of conduct, [REDACTED] is quickly developing the reputation of a bully who only cares about what affects his bottom line and is not motivated by what is important to BlackBerry; he is perceived as someone who will throw a colleague under the bus if it appears to be in his self-interest to do so. For someone who has been at BlackBerry for so short a period of time, this is deeply troubling. I believe it is only going to get worse and will result in even greater attrition.

I concluded that [REDACTED] [REDACTED] [REDACTED] view Neelam Sandhu as someone who interferes with the Elite 30 accounts they sell to and try and avoid having to engage with her whenever they can. They insult and belittle her and do not take her position seriously. This attitude is going to grow among the sales team if it is not dealt with swiftly and seriously.

The one bright spot in this entire mess is that Neelam Sandhu does provide a very valuable service with respect to the care and feeding of the Elite 30. She develops contacts that even her detractors admit they have not and cannot develop. Additionally, I would conclude that even if the salespeople were tasked with the responsibilities now performed by Neelam, they could not (and would not) do it. They have neither the time, the skills nor the inclination to do what she does. By failing to take advantage of the services and skills Neelam offers, the sales team is missing opportunities to engage in activities with their clients that will enhance revenue and increase their commissions. Unfortunately, at the end of the road, BlackBerry is the big loser in this fight.

My recommendation after hearing everything I heard and after giving [REDACTED] the opportunity to respond is that they both need to leave BlackBerry. As long as they continue to hold their current positions, BlackBerry will not only continue to lose opportunities to maximize revenue with the Elite 30, but more significantly, the company's ability to build a collegial, cooperative and pleasant place to work will be severely impeded. The bottom line is that so long as [REDACTED] occupy the positions they currently hold, we are going to lose people we cannot afford to lose and do not want to lose.

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On a personal note, I want to say I get no pleasure from drawing the conclusions I did and making the recommendation I made. My goal in all investigations I do is to find the facts and

then to objectively analyze those facts and make the recommendation that is in the best interests of my client. My 40 years of experience doing this for numerous Fortune 500 companies makes me confident I have reached the right conclusions in this case and made the recommendation that is best for BlackBerry's short and long-term interests.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard J. Curiale', with a long horizontal flourish extending to the right.

Richard J Curiale  
Managing Partner  
Curiale Wilson LLP  
San Francisco CA